

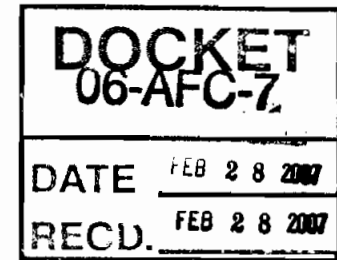
CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



February 28, 2007

Mr. Gregory Lamberg
Manager, Project Development
Pacific Gas and Electric Company
Mail Code N12G
P.O. Box 770000
San Francisco, CA 94177-0001

**RE: HUMBOLDT BAY REPOWERING PROJECT - DATA REQUESTS #s 79 - 85**

Dear Mr. Lamberg:

Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests (#s 79 - 85) is being made in the areas of Air Quality/Public Health (# 79), Biology (#s 80 - 81), Cultural Resources (# 82), Geology (#83) and Transmission System Engineering (#s 84 - 85). Consistent with the Memorandum of Agreement Between the California Energy Commission and the California Coastal Commission Regarding the Coastal Commission's Statutory Role in the Energy Commission's AFC Proceedings, the Energy Commission staff has included a data request on behalf of the Coastal Commission staff in the area of Geology. Written responses to the enclosed data requests are due to the Energy Commission staff on or before March 30, 2007, or at such later date as may be mutually agreeable.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to both the Committee and me within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, Section 1716 (f)).

If you have any questions, please call me at (916) 654-4679 or email me at jkessler@energy.state.ca.us.

Sincerely,

John S. Kessler
Project Manager

Enclosure

cc: Docket (06-AFC-7)
Proof of Service List
Agency List

PROOF OF SERVICE (REVISED 2/28/07) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 2/28/07

Technical Area: Air Quality and Public Health
Authors: Brewster Birdsall and Alvin Greenberg

BACKGROUND

Sensitivity Analysis for Worst Case Air Dispersion

The applicant (and its consultant) has stated that the air dispersion modeling for the health risk assessment used emissions estimates from all ten (10) engines operating at 50% load. The applicant indicated that these were considered "worst-case" emissions. At the Data Response Workshop of February 1, 2007, staff inquired as to the basis of this scenario being termed "worst-case" emissions and air dispersion and asked if other scenarios, such as 5 engines in one block and two in another all at full load, might result in greater ground level impacts than the scenario modeled by the applicant. The applicant responded that there were numerous combinations of engines running at various loads and felt that the scenario chosen best represented the emissions that would result in the highest ground levels concentrations of pollutants at off-site receptors. However, the applicant agreed that staff's question deserved more consideration and that a "sensitivity analysis" could be conducted that might serve as an additional basis for the scenario chosen. Staff further asked about the modeling approach used by the applicant whereby each block of 5 engines was modeled as one source thus resulting in the equivalent of two stacks of larger size being modeled instead of 10 individual stacks.

DATA REQUEST

79. Please provide additional support for the decision to model the 10 stacks as two groups of 5 and of using all 10 stacks running at 50% load as a "worst-case" scenario. Discuss how this modeling addresses plume rise and the impact on ground level concentrations at off-site receptors and include a sensitivity analysis of various combinations of engines and various loads.

Technical Area: Biological Resources
Author: John Mathias

BACKGROUND

The AFC for the Humboldt Bay Repowering Project (HPRB) states that permanent loss of wetland habitats will occur due to the project. Three on-site mitigation areas are identified for wetland enhancement, restoration, and creation to mitigate wetland impacts. The AFC indicates that some of the mitigation areas will be placed under permanent conservation easements, but it is unclear if all of the wetland mitigation areas will be placed under easements. Staff needs additional information regarding the conservation easements for all mitigation areas to complete its analysis.

DATA REQUESTS

80. Please provide the following:

- a) Indicate whether all of the areas proposed for wetland mitigation sites will be placed under permanent conservation easements. If all of the areas proposed as wetland mitigation sites will not be placed under permanent easements, please provide the total acreage of land that will be given easement status.
- b) Provide a map of the areas that will be placed under conservation easements.

81. Please provide the following:

- a) Indicate what organization will hold the conservation easements and its status (e.g. registered non-profit, etc).
- b) Indicate the expected terms of the easement regarding length of time, provisions for change of property ownership, and whether development of any sort would be permitted.

Technical Area: Cultural Resources
Author: Dorothy Torres

Please provide any documents under confidential cover that may reveal the location of an archaeological site.

BACKGROUND

Figure 2.3-1 identifies a proposed Construction Worker Access Trail. It does not appear that the trail was surveyed for archaeological resources. Staff needs the archaeological resources survey information to complete our analysis.

DATA REQUEST

82. Please provide information regarding the types of ground disturbing activities, if any, that may be necessary to construct the trail. Please survey the route for the Construction Worker Access Trails and provide the methodology, personnel, and results to staff. Please record any identified isolates or sites on a DPR 523 form and provide a copy of the form.

Technical Area: Geology

Author: Tom Luster and Mark Johnsson – California Coastal Commission

BACKGROUND

Section 30253 of the Coastal Act states, in part:

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

In order to assure that the HBRP will be stable and to assure its structural integrity, Coastal Commission Staff needs better information on the risk of surface fault rupture at the site.

DATA REQUESTS

83. Please provide a fault hazard study, consistent with guidelines published by the California Board for Geologists and Geophysicists, that identifies and maps the surface traces of any active faults that may cross the project site. These faults include but are not limited to, the Buhne Point Fault and the Discharge Canal Fault, which were identified during geologic studies related to licensing of the nearby Independent Spent Fuel Storage Installation (ISFSI) Project. Techniques that could be used include, but are not limited to, trenching and logging, contouring of marker beds identified in boreholes, and seismic reflection studies. Alternatively, please provide a description of the seismic hazard assumptions used in the facility design to ensure the project would maintain stability and structural integrity.

Technical Area: Transmission System Engineering
Author: Ajoy Guha

BACKGROUND

During the February 1, 2007 Data Response and Issue Resolution Workshop, staff requested clarification related to several previous responses to Data Request Set 1 (#s 45 – 48) pertaining to how the proposed HBRP would meet transmission system reliability standards. Following the workshop, PG&E provided some additional information which it refers to as its responses to Workshop Queries (WSQs 17 – 20). Staff has reviewed the most recent information provided by PG&E, and needs some additional clarification with regard to Data Responses 46 and 47. Specifically, staff needs confirmation that the CAISO approves of PG&E using a Special Protection Scheme (SPS) as a means for dropping one or more of the HBRP generators offline as may be necessary to mitigate the abnormal transmission system conditions.

DATA REQUESTS

84. Please provide written confirmation that the CAISO has agreed to the technical feasibility of using an SPS for dropping one or more of the HBRP generating units offline in order to mitigate the following conditions:
 - a) Category B overloads on the Humboldt-Trinity 115 kV line; and
 - b) Dynamic stability and low-frequency violations under Category B conditions on various lines; or.
85. As an alternative to obtaining CAISO approval of an SPS for Data Request 85(b), please demonstrate by performing a transient stability restudy that the 100-MVAR Static VAR Compensator adequately mitigates the dynamic stability and low-frequency violations.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE HUMBOLDT POWER
PLANT PROJECT

Docket No. 06-AFC-7
PROOF OF SERVICE

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 06-AFC-07
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

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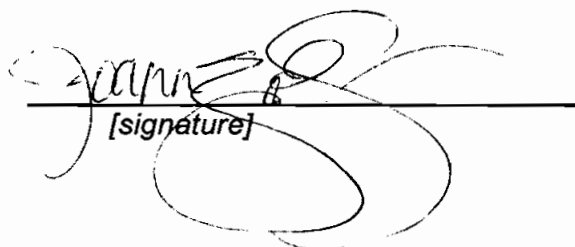
DECLARATION OF SERVICE

I, Joann Gonzales, declare that on February 28, 2007, I deposited copies of the attached Humboldt Bay Re-powering Project Data Request #s 79-85, in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


[signature]